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24 July 1999

Dockets Management Branch (HFA-305)

Docket numbers 98N-1230; 96P-0418; 97P-0197

Food and Drug Administration

5630 Fishers Lane, Room 1061

Rockville, MD 20852

RE: Docket numbers 98N-1230; 96P-0418; 97P-0197

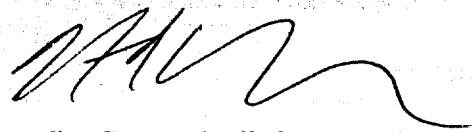
To Whom It May Concern:

The issue of *Salmonella enteritidis* infection and contamination of human food cannot be resolved simply by placing a warning label on egg cartons and regulating egg refrigeration temperatures. This does not resolve a *major cause of contamination*: the industry standard of 'forced molting' of chickens.

The poultry industry utilizes and advocates the withholding of *all* food for up to 14 days in order to synchronize the laying cycle of hens used for egg production. This industry standard, known as forced molting, is *not* done for the benefit of the hens. It is *not* done because it is medically indicated. It is done simply to maximize profits for the producer.

The FDA should prohibit the practice of forced molting for chickens used for egg production because forced molting has been scientifically shown to promote disease, in particular *Salmonella enteritidis* infection and shedding of organisms, by destroying the starving hens' immune systems. It also has been shown that this leads to substantial contamination of human food, through contamination of eggs. Removing this source of contamination will be more meaningful for human health and safety than any labeling system.

The FDA has jurisdiction to ban farm practices, such as forced molting, that ultimately injure human health. The FDA was petitioned in April 1998 to ban forced molting. This petition should be granted without further delay.



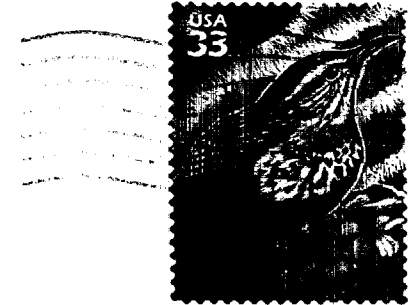
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File Number: 98N-1230/ C40

See File Number: 97P-0197/ C41

96P 0418/ C40